# **NOTICE**

All drawings located at the end of the document.

WERE OF RE-01769; 318-137-03

INDUSTRIAL AREA SAMPLING AND ANALYSIS PLAN FY04 ADDENDUM #IA-04-04 IHSS GROUP 100-1 UBC 122 (MEDICAL FACILITY) AND IHSS 000-121 TANK T-1 (OPWL)

Approval received from the Colorado Department of Public Health and Environment November 20, 2003.

Approval letter contained in the Administrative Record.

**NOVEMBER 2003** 

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## **ACRONYMS**

AL action level

CDPHE Colorado Department of Public Health and Environment

DOE U.S. Department of Energy

FY Fiscal Year

HPGe high purity germanium
HRR Historical Release Report

IA Industrial Area

IASAP Industrial Area Sampling and Analysis Plan

IHSS Individual Hazardous Substance Site

MDL method detection limit mg/kg milligrams per kilogram

N/A not applicable

NPWL New Process Waste Lines
OPWL Original Process Waste Lines
PCB polychlorinated biphenyl
pCi/g picocuries per gram

PCOC potential contaminant of concern RFCA Rocky Flats Cleanup Agreement SAP Sampling and Analysis Plan UBC under building contamination VOC volatile organic compound

#### 1.0 INTRODUCTION

This Industrial Area (IA) Sampling and Analysis Plan (SAP) (IASAP) Addendum #IA-04-04 includes Individual Hazardous Substance Site (IHSS)-specific information, sampling locations, and potential contaminants of concern (PCOCs) for IHSS Group 100-1, which is proposed for characterization during Fiscal Year (FY) 04. This IASAP Addendum is a supplement to the IASAP (DOE 2001). IHSS Group 100-1 is located in the west-central portion of the IA, beneath and around Building 122 (Figure 1). IHSS Group 100-1 consists of the following Under Building Contamination (UBC) sites and IHSSs:

- UBC 122 Building 122 Medical Facility; and
- IHSS 000-121 Tank T-1 Original Process Waste Lines (OPWL).

Building 122 housed (until September 2003) the on-site medical facilities of the Plant and the occupational health and internal dosimetry organizations. Emergency medical services, diagnosis, decontamination, first aid, x-ray, minor surgical treatment, and ambulatory activities were carried out in this building. The building also contained clinical facilities to support routine employee and subcontractor physical examinations. Body counting, to measure radioactive material in the body, was also conducted. The facility contains three general areas: administration, internal dosimetry, and medical/health.

Building 122 went into service in 1953. Major additions were made in approximately 1967, 1969, and 1989. Other smaller additions and internal modifications were also made during the building's service life.

Very few chemicals were used in Building 122, and only small volumes of chemical wastes were generated. Chemicals used in Building 122 were principally related to development of x-ray film (e.g., fixers and developers) and decontamination of workers (e.g., water, Clorox, soap, and hydrogen peroxide). Fixers and developers consisted of inorganic chemicals, with silver being the long-term contaminant of concern. Most of the film development work and related chemical storage occurred in Room 109. Starting in the mid-1980s, spent fixers were stored in a satellite accumulation area in Room 109. Developers and associated water were discharged into the sanitary system. Decontamination fluids originally drained to Tank T-1. After the tank was removed, the building was connected to the new process waste line (NPWL) system. No records were found indicating that x-ray chemicals or decontamination fluids either spilled or leaked within the building.

The Historical Release Report discusses research studies related to beryllium, plutonium, americium, and uranium (DOE 1992-2002). No records have been found indicating the exact location of these studies within Building 122, nor is there indication that spills or releases to the environment occurred. The presumption is that only small quantities of these elements were involved in the studies and that they were contained within the building.

Tank T-1 was an 800-gallon stainless steel storage tank used to collect wastewater streams from Building 122, the Medical Facility. The Historical Site Assessment (DOE 2003) states that the tank was located above ground. Other reports and available diagrams indicate it was located below ground (DOE 1992, 1994, DOW 1959). Waste drained from the building to the tank. When the tank was full, waste was pumped out to a tank truck and then discharged to the original process waste line (OPWL) system. Waste included trace radionuclides, bleach, soap, blood, and hydrogen peroxide. The tank was removed in January 1984.

## 2.0 EXISTING CHARACTERIZATION INFORMATION

Limited characterization information exists for the UBC Site and IHSS. The list of PCOCs was derived from historical process knowledge, interviews with building personnel and a building walkdown, and limited characterization data. Existing information and data for the UBC Site and IHSS are available in Appendix C of the IASAP (DOE 2001), the Historical Release Reports (HRRs) (DOE 1992-2003), and the IA Data Summary Report (DOE 2000). Table 1 presents the PCOCs.

Table 1
IHSS Group 100-1 PCOCs

IHSS Group	IHSS/PAC/UBC Site	Media	PCOCs	Data Source	Sampling Method
	UBC 122 Building 122 Medical Facility	Surface and subsurface soil	Radionuclides Metals	HRRs (DOE 1992- 2003) Process knowledge (DOE 2001)	Biased
100-1	Tank T-1 OPWL	Surface and subsurface soil	Radionuclides Metals	HRRs (DOE 1992- 2003) Process knowledge (DOE 2001) Sampling results	Biased

Existing analyte concentrations and activities above the background means plus two standard deviations (BM+2SD) or method detection limits (MDLs) (DOE 2001) are presented on Figure 2. Three existing subsurface soil-sampling locations (01095, 01195, and 01295) lie south of UBC 122 and were intended to investigate the Tank T-1 site. Soil at all three locations was analyzed for metals and radionuclides. Only borehole 01295 was analyzed for VOCs. Data indicate that plutonium-239/240 and americium-241 results were less than the Wildlife Refuge Worker (WRW) and Ecological Receptor ("ECO") Action Levels (AL) (Figure 2). Metals were less than BM+2SD, and VOCs were less than MDLs.

The existing soil sampling locations that were intended to overlie the IHSS 000-121 Tank T-1 site do not coincide with the tank as plotted on the map. This is probably because of a discrepancy in determining the exact location of the tank because it had been removed before the IHSS was identified. Building drawings were evaluated to determine where the tank was located; however, no information exists as to the exact location.

The location of IHSS 000-121, as shown on the figures herein, is the best estimate for the area that contained the tank. If field activities find indications of the former tank, such as staining or backfill, sampling locations and/or intervals will be modified to take them into consideration.

Sinks and showers are present in several parts of the building, and their historical use was evaluated in terms of sampling locations and PCOCs. The building was also evaluated in terms of surface radioactive contamination. Historical information indicates that two areas were significantly contaminated by removable radioactive particulates. These areas were decontaminated to the standard of the time.

The body counting rooms have steel walls with lead, tin, and zinc plating. It is highly unlikely that these metals leached in any significant quantities and migrated into the soil. However, metals are PCOCs at all locations being sampled.

Polychlorinated biphenyls (PCBs) were in oils used in the x-ray equipment. However, because only a small amount of PCBs was present, no PCB spills were documented, and no migration pathway is evident, PCBs are not PCOCs.

#### 3.0 SAMPLING

The proposed number and types of samples for IHSS Group 100-1 are summarized in Table 2 and shown on Figure 3. Specific sampling requirements are listed in Table 3. Only biased sampling locations will be used, and they are based on existing information.

Table 2
Sampling Summary

Category	Total
Number of Sampling Locations	8
Number of Samples	32
Number of Radionuclide Analyses	32
Number of Metal Analyses	32

Because of the uncertainty associated with the tank location, two sampling locations (BT38-001 and BU38-018) were selected to assess potential contamination in the area of the former Tank T-1. Samples will be collected from seven intervals, extending from the surface to 12.5 feet to adequately characterize potential pathways whether the tank was above or below ground.

Sampling Locations BT38-006, BT39-007, and BT39-008 were selected to determine if any radioactive contamination has reached soil underneath Building 122 from decontamination activities in adjacent rooms. Location BT39-007 is positioned where the drain from a cadaver table in Room 119 entered the wall. Location BT39-008 is positioned under Room 127 to assess the co-mingled drain from four grouted showers in Room 127A. Patches in the floor of Room 127 (containing BT39-008) are the result of repairs to the drain system after contamination of the cadaver table and shower room (personal communication R. Bistline). Results from Sampling Location BT38-006 will supplement data from the two adjacent locations because it is also located along the drain line. Samples in this area will be collected from 4 intervals to a depth of 6.5 feet in order to ensure that potential contamination from the drain line is identified.

Sampling Locations BT39-010 and BU39-003 are positioned to assess radioactive surface contamination. Sampling Location BT39-010 is in a ward area where the floor was contaminated by particulate radionuclides beneath a bed. The area was decontaminated at the time. Because of carpeting in the area, it is difficult to assess obvious pathways to the soil. Location BT39-010 will be sampled for radionuclides and metals in one interval from 0.0 to 0.5 feet below the slab to check for contamination. Similarly, Location BU39-003 had particulate radioactive contamination. The location is in the Building 122 entryway, which was contaminated by a worker disrobing. The area was decontaminated, and floor tiles were removed and replaced. There are no obvious pathways to the soil. One interval at Location BU39-003 will be sampled from 0.0 to 0.5 feet in depth to assess conditions below the slab.

Sampling Location BT39-009 is located in Room 109 where x-ray film was developed and related chemicals were stored. Samples at Location BT39-003 will be collected from 4 intervals to a depth of 6.5 feet to look for potential contamination originating from two sinks in the room. The location was selected because it is half way between the sinks (one sanitary and one process waste) along the northern wall of the room.

Proposed new sampling locations are the starting point for IHSS Group characterization. After characterization starts, the number and type of samples may change based on sampling results. If contaminant concentrations are found to be above ALs near and under the Building 122 slab, additional samples will be collected in consultation with the regulatory agencies, and a contact record will be issued. Sampling locations will be field-checked and adjusted if necessary through the consultative process. In addition, after the slab is removed, additional sampling will be conducted if staining is observed. Details will be developed in consultation with the regulatory agencies.

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Table 3
Sampling Specifications for IHSS Group 100-1

Off-site Laboratory	Method	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec	6010	Alpha Spec
On-site Laboratory	Method	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	6200	HPGe	N/A	HPGe
Analyte		Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal	Radionuclides	Metal (including Be)	Radionuclides
Depth Interval	HIGHAI	0-0.5	0-0.5	0.5-2.5'	0.5-2.5	2.5-4.5'	2.5-4.5'	4.5-6.5	4.5-6.5'	6.5-8.5	6.5-8.5	8.5-10.5'	8.5-10.5'	10.5-12.5'	10.5-12.5	0-0.5	0-0.5	0.5-2.5	0.5-2.5	2.5-4.5	2.5-4.5	4.5-6.5'	4.5-6.5'	0-0.5	0-0.5	0.5-2.5	0.5-2.5	2.5-4.5'	2.5-4.5'	4.5-6.5	4.5-6.5	0-0.5	0-0.5	0.5-2.5'
Media		Surface Soil	Surface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Surface Soil	Surface Soil	Subsurface Soil	Surface Soil	Surface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Surface Soil	Surface Soil	Subsurface Soil										
Northing	)	749139.535	749139.535	749139.535	749139.535	749139.535	749139.535	749139.535	749139.535	749139.535	749139.535	749139.535	749139.535	749139.535	749139.535	749157.934	749157.934	749157.934	749157.934	749157.934	749157.934	749157.934	749157.934	749173.299	749173.299	749173.299	749173.299	749173.299	749173.299	749173.299	749173.299	749164.965	749164.965	749164.965
Easting	0	2081531.718	. —	2081531.718			-	(	.,					2081531.718	2081531.718	7081533 367	2081533.367	2081533 367	2081533 367	2081533 367	2081533.367	2081533.367	2081533.367	2081535 299	2081535,299	2081535 299	2081535.299	2081535.299	2081535 299	2081535 299	2081535 299	2081531 653	2081531.653	2081531.653
Location	Code	BT38-001A	RT38-001A	BT38-001B	BT38-001B	BT38-001C	BT38-001C	BT38_001D	BT38-001D	BT38-001E	BT38-001E	BT38-001E	PT38 001E	BT38-001G	BT38-001G	+-	1	+	_	1	1	1	1_	Т		_	RT39-007B	_		1		BT39-00/E	BT39-008A	BT39-008B
IHSS/PAC/UBC					<u> </u>		IHSS 000-121	Tank T-1 at	Medical Facility	Building	(Biased Samples)	•			•									, C	Medical Facility	Ruilding	(Riased Samples)	(conduction of the control of the co						
IHSS	Group		•						100-1																	100-1								

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IHSS   IHSS/PAC/UBC								(MF.cito
Group	Location	Easting	Northing	Media	Depth Interval	Analyte	Laboratory Method	Laboratory Method
	4000	0001571 652	740164 065	Subsurface Soil	05-25'	Metal	N/A	6010
	B139-008B	500.1501.007	147104.202	The contract of the contract o		(including Be)		
	BT39-008C	2081531.653	749164.965	Subsurface Soil	2.5-4.5	Radionuclides	HPGe	Alpha Spec
	BT39-008C	2081531.653	749164.965	Subsurface Soil	2.5-4.5'	Metal (including Be)	N/A	6010
	BT30-008D	2081531653	749164.965	Subsurface Soil	4.5-6.5'	Radionuclides	HPGe	Alpha Spec
	BT39-008D	2081531.653	749164.965	Subsurface Soil	4.5-6.5'	Metal	N/A	6010
UBC 122		2001450 204	740103 000	Surface Soil	0-0.5	(Including De) Radionuclides	HPGe	Alpha Spec
100-1 Medical Facility	B139-009A	2081450.294	749193.090	Surface Soil	0-0.5	Metal	6200	6010
		2081450.234	749193.090	Subsurface Soil	0.5-2.5'	Radionuclides	HPGe	Alpha Spec
(Blased Samples)		2081450.294	749193.090	Subsurface Soil	0.5-2.5	Metal	6200	6010
	BT30_000C	2081450 294	749193.090	Subsurface Soil	2.5-4.5'	Radionuclides	HPGe	Alpha Spec
	RT39-009C	2081450.294	749193.090	Subsurface Soil	2.5-4.5	Metal	6200	6010
	RT39-009D	2081450.294	749193.090	Subsurface Soil	4.5-6.5'	Radionuclides	HPGe	Alpha Spec
	BT39-009D	2081450 294	749193.090	Subsurface Soil	4.5-6.5	Metal	6200	6010
	RT39-010A	2081512534	74220.564	Surface Soil	0-0.5	Radionuclides	HPGe	Alpha Spec
	BT30-010A	2081512 534	74220.564	Surface Soil	0-0.5	Metal	6200	6010
	B1138-018A	2081542.916	749150.733	Surface Soil	0-0.5	Radionuclides	HPGe	Alpha Spec
	BIT38-018A	2081542.916	749150.733	Surface Soil	0-0.5	Metal	6200	6010
	BI138-018R	2081542.916	749150.733	Subsurface Soil	0.5-2.5	Radionuclides	HPGe	Alpha Spec
	B1138_018B	2081542 916	749150.733	Subsurface Soil	0.5-2.5	Metal	6200	6010
	B1138_018C	2081542 916	749150.733	Subsurface Soil	2.5-4.5'	Radionuclides	HPGe	Alpha Spec
IHSS 000-121	BIT38-018C	2081542.916	749150.733	Subsurface Soil	2.5-4.5'	Metal	6200	6010
Tank T-1 at	BI138-018D	2081542 916	749150.733	Subsurface Soil	4.5-6.5	Radionuclides	HPGe	Alpha Spec
100-1   Medical Facility		2081542 916	749150.733	Subsurface Soil	4.5-6.5	Metal	6200	6010
Building		2081542 916	749150.733	Subsurface Soil	6.5-8.5	Radionuclides	HPGe	Alpha Spec
(Biased Samples)		2081542 916	749150.733	Subsurface Soil	6.5-8.5	Metal	6200	6010
	B1138 018E	2081542 916	749150.733	Subsurface Soil	8.5-10.5	Radionuclides	HPGe	Alpha Spec
	RI138-018F	2081542.916	749150.733	Subsurface Soil	8.5-10.5'	Metal	6200	6010
	2000-0000	2001542.016	740150 733	Subsurface Soil	10.5-12.5	Radionuclides	HPGe	Alpha Spec
	BU38-018G	2081542 916	749150.733	Subsurface Soil	10.5-12.5	Metal	6200	6010
UBC 122	BU39-003A	2081539.617	749198.559	Surface Soil	0-0.5	Radionuclides	HPGe	Alpha Spec
100-1 Medical Facility	y BI130 003A	2081539 617	749198.559	Surface Soil	0-0.5	Metal	6200	0109
Building (Biased Samples)	<u> </u>	710.255.017	10001111					

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